

**TAB 15**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

|                         |   |                   |
|-------------------------|---|-------------------|
|                         | x |                   |
|                         | : |                   |
| THE CITY OF HUNTINGTON, | : | Civil Action      |
|                         | : |                   |
| Plaintiff,              | : | No. 3:17-cv-01362 |
|                         | : |                   |
| v.                      | : |                   |
|                         | : |                   |
| AMERISOURCEBERGEN DRUG  | : |                   |
| CORPORATION, et al.,    | : |                   |
|                         | : |                   |
| Defendants.             | : |                   |

|                           |   |                   |
|---------------------------|---|-------------------|
|                           | x |                   |
|                           | : |                   |
| CABELL COUNTY COMMISSION, | : | Civil Action      |
|                           | : |                   |
| Plaintiff,                | : | No. 3:17-cv-01665 |
|                           | : |                   |
| v.                        | : |                   |
|                           | : |                   |
| AMERISOURCEBERGEN DRUG    | : |                   |
| CORPORATION, et al.,      | : |                   |
|                           | : |                   |
| Defendants.               | : |                   |

BENCH TRIAL - VOLUME 28  
BEFORE THE HONORABLE DAVID A. FABER, SENIOR STATUS JUDGE  
UNITED STATES DISTRICT COURT  
IN CHARLESTON, WEST VIRGINIA

JUNE 16, 2021

1 convening that they're trying to get a handle on how do you  
2 establish clinical criteria for Neonatal Abstinence Syndrome  
3 or withdrawal and they asked me to present information.

4 That's a sampling of the times that I've testified at  
5 Congress and the Senate and a few of the publications that  
6 are specific to this topic area, the Family Treatment Court  
7 Best Practice Standards were, again, funded by the  
8 Department of Justice and SAMHSA, the Substance Abuse and  
9 Mental Health Service Administration and Children's Bureau  
10 funded this monograph on A Collaborative Approach for  
11 Pregnant and Parenting Women with Opioid Use Disorders.

12 **Q.** And, Dr. Young, you mentioned that this was a sample of  
13 your publications and speeches. Roughly how many other  
14 articles and publications have you authored?

15 **A.** In the scientific literature, probably 10-15, but that  
16 hasn't really been my career. My career has been more of  
17 what they call the gray material, things that the government  
18 publishes.

19 We've been the contractor to the Children's Bureau who  
20 funds child welfare and they jointly fund the National  
21 Center on Substance Abuse and Child Welfare. We've been  
22 that contractor since 2002. So, 19 years.

23 During that time, I'd say, reports, we've done well  
24 over 50 reports to the federal government similar to this  
25 consensus document that SAMHSA published.

1       **Q.**   And are all of those publications related to child  
2       welfare, pregnant women, children and family services?

3       **A.**   Yes.

4       **Q.**   And has any of your work related to the impact of the  
5       opioids in particular?

6       **A.**   Yes. In fact, it was about 2010 or so that our project  
7       officer from SAMHSA tasked us with really getting a handle  
8       on what was going on with opioids. They had, you know, the  
9       emerging data, 2010, about the impact in the child welfare  
10      system and asked us to do first this monograph, as well as  
11      really understand what the impact was. So, we've been at  
12      that for about a decade of really understanding the impacts  
13      of opioids on children and families. And various  
14      initiatives that we've -- some that we've talked about  
15      already today have been specifically about families affected  
16      by opioids.

17      **Q.**   And in how many different states have you worked on  
18      matters directly related to opioids?

19      **A.**   In my career, since 1996 or so, I've actually been to  
20      every state. I've either given a speech, or facilitated a  
21      work group. But, right now, I think I ran through some of  
22      the numbers of states that we're working in right now.

23      **Q.**   And, Dr. Young, has your professional work involved  
24      assessing and supporting programs that effectively serve  
25      mothers, children and families affected by Substance Abuse

1 Disorders?

2 **A.** Yes, absolutely. That's what the developing knowledge  
3 is about, understanding the research literature, as well as  
4 really talking to people in communities about what they're  
5 trying, what they're being successful at, but also  
6 evaluating the research to -- and their program evaluations  
7 to understand what works.

8 **Q.** And have you also had professional experience in  
9 determining the costs of those various programs and  
10 services?

11 **A.** Yes. It's always a specific that people want to know  
12 is what's the bang for the buck and so we try and understand  
13 what the costs of those services are across all of the  
14 aspects of what it takes to innovate, and to implement, and  
15 to sustain these kinds of programs and have these programs  
16 go through these various stages to be able to really stand  
17 them up and have them be something that families can count  
18 on.

19 **Q.** And in the course of your work related to the costs of  
20 these programs and services, have you had a chance to  
21 examine or become familiar with federal grant and federal  
22 funding programs?

23 **A.** Oh, yes. We've published about all of the funding  
24 streams that come into states from the federal government  
25 across substance use prevention and treatment, child welfare